

UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

A05-0283CV(JKS)

Lewis king Deans

Vs.

Anchorage School District/ Cindy Anderson-official capacity
Jerry Sjolander-official capacity

Dimond High School-Jim Aronow-Official Capacity Special Ed Chair

Civil Rights Complaint

Cheryl Guyette- Official Capacity Principal
Julie Neal -Assistant principal
Debra Wilson -official Capacity
Krista Shank official capacity

42 U.S.C. 1983
(Non Prisoners 28 U. S. C 1343(8)(3))

Sharon Shumacher-Official Capacity-Program Manager
Art Arnold-Official Capacity State Special Ed.
Alaska Depart of Education and Early Development
Division of learning and support

Motion to Remove Co-Plaintiff
Felicia King

I MOTION THE COURT TO TAKE JUDICIAL NOTICE IN APPLICATION FOR LEAVE TO PROCEED INFORMA PAUPERIS UNDER 1915, WHERE SUBMISSION OF STATEMENT OF INCOME FROM ME LEWIS DEANS WAS ALREADY FILED. THIS IS TO BE ADDED TO THE PRE-LIMINARY INJUNCTION ALREADY SUBMITTED AND FILED DECEMBER 2, 2005, IN WHICH FELICIA KING NAME APPEARED BECAUSE SHE WAS ALLOWED TO REPRESENT ME IN EDUCATIONAL MATTERS AND DUE PROCESS, IN ATTEMPTING TO EXHAUST ADMINISTRATIVE REMEDIES WHERE SHE WAS A CO-COMPLAINANT. HOWEVER I AM FILING THIS ON MY OWN IN CIVIL COURT, THIS IS WHY SHE DID NOT SUBMIT A WAIVER ALSO WHY I, LEWIS DEANS REQUESTED COUNSEL, THIS IS PROOF THAT SHE IS NOT ATTEMPTING TO REPRESENT ME, OTHERWISE WHY WOULD I REQUEST COUNSEL?. ALSO THE FACT THAT SHE DID NOT SUBMITT A FINANCIAL WAIVER IS PROOF SHE WAS NOT FILING A CLAIM. SHE DID ASSIST ME IN ATTEMPTING TO EXHAUST ADMINISTRATIVE REMEDIES , WHEN SHE COULD ASSIST ME.

. SO HER NAME APPEARED AS CO-PLAINTIFF BECAUSE HER AND MYSELF HAD A RIGHT TO ATTEMPT TO EXHAUST LEGAL REMEDY. AND PROOF AND EVIDENCE WILL HAVE HER NAME ON DOCUMENTS. AND THAT IS THE ONLY REASON HER NAME APPEARS AS A CO-PLAINTIFF. SINCE WE MUTUALLY FILED COMPLAINTS WITH THE EDUCATIONAL AGENCY FOR ADMINISTRATIVE RELIEF AND DUE PROCESS. HOWEVER THAT DOES NOT IMPLY THAT SHE IS FILING THIS CASE AS A PLAINTIFF OR TRYING TO REPRESENT ME.

THE PRESIDING JUDGE ALREADY ACKNOWLEDGED THAT A WAIVER APPLICATION WAS NOT COMPLETED BY HER, THAT PROVES IT WAS NOT HER INTENTION TO FILE A COMPLAINT

THE JUDGE HAS A MOTION FROM ME LEWIS DEANS REQUESTING LEGAL COUNSEL. SO THAT IS PROOF I DID NOT EXPECT HER TO REPRESENT ME IN CIVIL COURT. I FILED A REQUEST DATED DEC 15, 2005, THEREFORE THE FILING OF DEC 22, 2005 ACTING IF MY MOTHER HAD ASSUMED THE POSITION OF MY LEGAL COUNSEL IS IN ERA. BECAUSE IT WAS AFTER THE FACT THAT I ALREADY FILED MOTION FOR COUNSEL, WHICH IS A

SCANNED

STATEMENT OF LACK OF COUNSEL

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THE JUDGE IS ASSUMING FELICIA KING AS THE PLAINTIFF AND TELLING HER TO AMEND THE COMPLAINT, SHE DIDN'T EVEN COMPLETE A FINANCIAL WAIVER TO FILE A COMPLAINT, I DID LEWIS DEANS, AGAIN THE JUDGE IS OVERLOOKING ME, AND SEEING WHAT HE WANTS TO SEE. LEWIS DEANS IS THE PLAINTIFF. ANYTHING NEED TO BE AMENDED, IS ON ME. ALL THE VIOLATIONS WAS OF MY RIGHTS LEWIS DEANS, FELICIA KING NEVER COMPLAINED ABOUT ANY VIOLATIONS OF HER RIGHTS. HER NAME IS THERE ONLY BECAUSE SHE ATTEMPTED TO EXHAUST ADMINISTRATIVE REMEDIES. IF SHE HASN'T GIVEN ANY MONEY OR COMPLETED AN WAIVER, OR SUBMITTED PROOF OF HER INCOME, SHE HASN'T FILED A COMPLAINT, AND NEVER INTENDED TO. AND IF I REQUESTED AN ATTORNEY OR LEGAL COUNSEL, THAT IS PROOF THAT SHE OR I DIDN'T INTEND HER AS LEGAL COUNSEL

I MOTION THE COURT TO TAKE JUDICIAL NOTICE, THAT I LEWIS DEANS REQUEST ANOTHER JUDGE TO OVERSEE MY COMPLAINT. I AM TRYING TO DEFEND MY RIGHTS TO EDUCATION, AND I SHOULD NOT HAVE TO PUT ENORMOUS AMOUNTS OF ENERGY DEFENDING MY RIGHT TO DUE PROCESS TO JUDGE JAMES K. SINGLETON WHO EVIDENTLY IS NOT FOCUSING ON MY RIGHTS TO AN INJUNCTION, AND MY RIGHT TO EDUCATION, AND MY RIGHT TO FREE AND APPROPRIATE EDUCATION. HE IS OVERLOOKING THE FOUR CORNERS OF LAW, CAUSING MY RIGHTS TO EDUCATION TO CONTINUE BEING HELD HOSTAGE, WHILE HE DIGS UP UNRELATED ISSUES THAT HAVE NO BASIS OF SUBSTANTIATION TO MY FILING A COMPLAINT. HE IS OVERLOOKING THE FACT THAT THIS IS SUPREME COURT AND CONGRESSIONALLY MANDATED LAW, AND THE MERIT IN THIS CASE IS CLEAR. HE IS TRYING TO MAKE A CASE OUT OF MY MOTHER, WHILE MY RIGHTS TO EDUCATION IS BEING DENIED AND I AM SEEKING REMEDY. I AM OLD ENOUGH, AND HAVE THE RIGHT TO SEEK DUE PROCESS, IN A COURT OF CIVIL LAW. THE JUDGE PUTTING ALL ENERGY AND FOCUS ON MY MOTHER, AND NOT MY RIGHTS IS CLEARLY, OBSTRUCTING MY RIGHTS TO SEEK REDRESS, THEREFORE HE SHOULD BE REMOVED FROM MY CASE, IF HE WANTS TO MAKE A CASE WITH MY MOTHER. WHO AGAIN, DID NOT GIVE, NO MONEY, NO COMPLETE FINANCIAL WAIVER, TO MAKE A COMPLAINT. A JUDICIAL COMPLAINT WILL BE FILED.

I I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT I AM ACTING AS MY OWN COUNSEL. UNTIL THE COURT PROVIDES ME WITH COUNSEL AS FILED AND STAMPED DEC. 15, 2005 A WEEK PRIOR TO THE JUDGE CLAIMING, FELICIA KING WAS TRYING TO REPRESENT ME. IN WHICH I HAVE A COPY OF. AGAIN THAT PROVES THAT MY MOTHER DID NOT INTEND TO ACT LIKE AN ATTORNEY ON MY BEHALF. HER VERIFYING IN THE SUMMARY JUDGEMENT, JUST OVERLOOKED THE WORD PLAINTIFF ON THE FORM, HOWEVER THAT SHOULD NOT PENALIZE ME, I AM THE PLAINTIFF, SHE INTENDED TO ACT AS A WITNESS. ALSO HER NAME ON THE COVERSHEET WAS TO MAKE SURE ALL COURT PAPERS WAS PUT IN THE RIGHT BOX. SINCE WE ARE NEW TO OUR HOUSING, AND SOME MAIL WITH MY NAME LEWIS DEANS WAS RETURNED TO DIMOND HIGH SCHOOL WHICH THEY CAN VERIFIED.. SO BOTH OF OUR NAMES APPEAR TO MAKE SURE THAT THE COURT PAPERS ARE NOT SENT BACK AND ARE RECEIVED IN A TIMELY MANNER.

I MOTION THE COURT ON MY OWN BEHALF AS BEING 19 ALMOST 20 YEARS OF AGE, AND STILL ELIGIBLE UNDER IDEA. YET OF LEGAL, AGE FOR SELF-REPRESENTATION IN COURT, UNTIL MY MOTION FOR LEGAL COUNSEL IS IMPLEMENTED.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT I HAVE NOT BEEN DECLARED MENTALLY INCAPCITATED. A POWER OF ATTORNEY IS NOT A DECLARATION OF MENTAL INCAPACITATION. AND IS NOT A INSTRUMENT TO PREVENT ME, LEWIS DEANS FROM

PROTECTING MY EDUCATIONAL RIGHTS IN CIVIL COURT.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT FELICIA KING IS MY POWER OF ATTORNEY IN EDUCATIONAL MATTERS WHERE IT APPLIES, BECAUSE I LIVE WITH HER AND SHE PROVIDES ME WITH SUPPORTS, LIKE ANY OTHER PARENT. HOWEVER MY LEGAL RIGHT TO REPRESENT MYSELF IN COURT IS NOT NEGATED. OTHER PEOPLE HAVE POWER OF ATTORNEY, AND IT DOES NOT NEGATE THEIR RIGHT TO FILE LAWSUIT IN MATTERS OF CIVIL OR EDUCATIONAL RIGHTS.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE, I LEWIS DEANS CAN READ , WRITE AND TYPE. THAT IS WHY MY EDUCATION IS IMPORTANT TO ME, I DO HAVE POTENTIAL, ME HAVING A DISABILITY, DOES NOT CLAIM ILLITERACY OR IGNORANCE. ALSO I HAVE KNOWLEDGE OF MY EDUCATIONAL RIGHTS UNDER IDEA. AND EXPECT TO BE INCLUDED IN ANY AND ALL EDUCATIONAL DECISIONS MADE ON MY BEHALF. ALSO THE PROPER TIME TO DELIBERATE OVER ANY AND ALL LEGAL DECISIONS. I AM REQUESTING AN ATTORNEY WITH KNOWLEDGE OF SPECIAL EDUCATION FOR TECHNICAL AND COURT ETTIQUETTE. MY PREVIOUSLY FILING OF A MOTION OF REQUEST FOR LEGAL COUNSEL IS PROOF THAT, MY MOTHER FELICIA KING DID NOT INTEND TO ACT AS AN ATTORNEY. THE SPACE THAT PROVIDES FOR ATTORNEY WAS FILED PRO'SE; AND SENT TO FELICIA KING, BECAUSE SHE IS THE LESSEE OF OUR RESIDENTIAL DWELLING, AND DID NOT WANT ANY PAPERS LOST IN THE PROCESS.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE, ANY LEGAL FEES REQUESTED BY FELICIA KING, WAS PERTAINING TO REIMBURSEMENT OF LEGAL EXPENSES, BEFORE I LEWIS DEANS EVEN CAME TO CIVIL COURT. SHE DID SPEND MONEY ON LEGAL CONSULTATION AND SEEKING DUE PROCESS WITH THE SEA.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT I AM REQUESTING ALL THE CONSTITUTION RIGHTS OF A PRO' SE' LITIGANT TO REDRESS GRIEVANCES AND RIGHTS UNDER THE CONSTITUTION GRANTED BY THE 13TH AND 14TH AMENDMENTS AND ALL THE CONSITUTIONAL RIGHTS ENTITLED UNDER IDEA. AND ALL THE CONSTITUTIONAL RIGHTS GIVEN TO POOR PROSE LITIGANTS. AND ANY TECHNICAL ERROR MADE, LIKE MY MOTHER FELICIA KING NAME APPEARING AS A CO-PLAINTIFF IN THE LAWSUIT, THAT I AM FILING ON BEHALF OF MYSELF LEWIS DEANS. SHOULD NOT BE USED TO VIOLATE, ANY CONSTITUTIONAL RIGHT, IF I CORRECT THAT ERROR IN THE COVER PAGE BEFORE ANY SUMMONS IS SENT, WHICH NONE HASN'T BEEN. AND I REQUESTED LEGAL COUNSEL. HOWEVER, THE SUBSTANCE OF THE ORIGINAL FILING OF THE PRE-LIMINARY INJUNCTION SUPPORTED BY THE VERIFICATION OF MOTION OF SUMMARY JUDGEMENT STANDS, IN SUPPORT OF MY CLAIMS AND IS THE FOUNDATION OF THIS CASE, THE REMOVAL OF A NAME ON A COVER SHEET WHEN THE SUMMONS HAVEN'T EVEN BEEN ISSUED IS EASILY CORRECTED AND SHOULD NOT BE A HINGE IN PROCEEDING.. SINCE WE ARE CLEAR THAT FELICIA KING DID NOT SUBMITT A FINANCIAL WAIVER, AND FELICIA KING, DID NOT REQUEST THAT SHE REPRESENT ME OR HERSELF. I REQUESTED LEGAL COUNSEL, AND I CAN READ AND WRITE AND TYPE AND HAVE ACCESS TO THE INTERNET, LAWS AND INFORMATION JUST LIKE ANYONE ELSE.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT THE POWER OF ATTORNEY IS SUBMITTED TO MAKE THE COURT AWARE THAT I HAVE SOME LEVELS OF PARENTAL SUPERVISION, AND I AM NOT A CHILD UNDER STATE SUPERVISION, THAT'S ALL!

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT A NOTICE GIVEN TO THE SCHOOL CITING THAT I AM NOT ABLE AND PREPARED TO GOVERN ALL DECISIONS BY MYSELF, IS NOT STATING THAT I AM INCAPACITATED AND CAN'T MAKE ANY DECISIONS. JUST NOT ALL. ALSO AS WE BOTH KNOW THE SCHOOL AND CIVIL COURT ARE SEPARATE ENTITIES.

MY MOTHER CAN REPRESENT ME IN DUE PROCESS AND SCHOOL MATTERS, SO WE BOTH HAD THE RIGHT TO DECIDE THAT SHE BE THERE, RATHER THEN ME, BEING ISOLATED. ALSO NO ONE CAN MAKE ALL DECISIONS BY THEMSELVES, BUT THAT DOESN'T MEAN THEY CAN'T MAKE ANY.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT FELICIA KING DID NOT FILE THE COMPLAINT, I LEWIS DEANS DID. SO THERE IS NOTHING FOR HER TO AMEND. HOWEVER I LEWIS DEANS WILL CORRECT THE COVER SHEET, IN TERMS OF PROCEEDING WITH THE SUMMONS, SINCE IT HAS ALREADY BEEN 7 WEEKS. I AM CORRECTING THE COVER SHEETS AS OF JANUARY 12, 2006.

. I MOTION THE COURT THAT I CAN REPRESENT MYSELF. THEREFORE ANY COMPLAINT FILED WHERE FELICIA KING NAME APPEARED, WAS IN NAME ONLY, NOT AS AN ATTORNEY OR COUNSEL, OR CO-PLAINTIFF, OR SHE WOULD HAVE SUBMITTED HER FINANCIAL INFORMATION REQUESTING AWAIVER, AND I LEWIS DEANS WOULDN'T HAVE SUBMITTED A MOTION AND AN APPLICATION FOR COUNSEL.

I MOTION THE COURT TAKE JUDICIAL NOTICE THAT ANY REQUESTED ASSISTANCE, DOES NOT NEGATE THE INPUT AND RIGHTS OF LEWIS DEANS TO PARTICIPATE, AND BE FULLY INVOLVED WITH ANY LEGAL DECISIONS MADE ON BEHALF OF MYSELF LEWIS DEANS AND HIS EDUCATIONAL RIGHTS AND PROTECTIONS.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE JAN 12, 2006 I AM FILING AN APPEAL FROM ADMINISTRATIVE EXHAUSTION. I RECEIVED A LETTER DATED DEC.13, 2005 AN ANSWER TO A COMPLAINT FILED SEPT 21, 2005 ORIGINALLY. THE ANSWER ON THE LETTER DATED DEC 5, 2005. BUT RECEIVED BY MAIL DEC 13, 2005 WAS THE CONCLUSION OF A STATE IVESTIGATIVE COMPLAINT FILED WITH THE DEPT. OF SPECIAL ED. SERVICES WITH THE NAMED DEFENDANTS ABOVE. IN WHICH THE ORIGINAL COMPLAINT WAS FILED SEPT 21, 2005 TO ADDRESS WHY THE STAY PUT PROVISION 1415 (E) WAS NOT BEING COMPLIED WITH BY THE ANCHORAGE SCHOOL DISTRICT. THE STATE AGENCY DID NOT PROPERLY FOLLOW THE LAW OF THE 60 DAYS WHICH WOULD HAVE FINISHED THE INVESTIGATION BY NOV.21, 2005 INSTEAD OF DEC 5, 2005. THE COMPLAINT AND INVESTIGATION WAS SEVERLY DEFECIENT IN LAW AND PROCEDURE. EVERYTHING UNDER IDEA 1400 ELIGIBILITY WHICHME, LEWIS IS STAYED PUT UNDER SHOULD HAVE BEEN INVESTIGATED, WITH THE EXCEPTION OF FREE AND APPROPRIATE EDUCATION 20 U.S.C. 1414(d, WHICH A DUE PROCESS HEARING WAS FILED FOR OCT 4, 2005 . THE STATE AGENCY ACTING UNDER THE COLOR OF THEIR INTERPRETATION, TRIED TO ACT AS IF FREE AND APPROPRIATE EDUCATION, AND IDEA STAY PUT OF ELIGIBILITY WAS THE SAME ,AND WAS THE SAME SUBJECT FILED IN THE DUE PROCESS HEARING.. IDEA ELIGIBILITY WHICH THE STATE ED AGENCY WAS SUPPOSE TO ADDRESS, IS NOT THE SAME THING AS THE PROVISION OF SERVICES WHICH MY MOTHER FELICIA KING WAS ATTEMPTING TO ADDRESS BY FILING FOR DUE PROCESS.

THE ONLY PART SHOULD HAVE BEEN REMOVED FROM THE INVESTIGATION IS 300.300 THROUGH 300.313. ALL ELSE OF THE STAY PUT PROVISION OF ELIGIBILITY 1400 , WHICH MAINTAINED LEWIS DEANS ELIGIBILITY OF IDEA SHOULD HAVE BEEN INVESTIGATED.

THIS SERVES AS PROOF THAT THE DUE PROCESS WOULD HAVE BEEN FULTILE SINCE THE STATE ED AGENCY IS TOO INCAPACITATED TO CORRECT PROCEDURAL BREACHES THAT WOULD ALLOW DUE PROCESS AND PROPER GREIVANCE PROCEDURES TO FUNCTION WITHOUT FUTILITY. *THEY ILLEGALLY TOOK MORE THAN 60 DAYS TO IVESTIGATE THE PROCEDURAL BREACH AND FURTHER BREACHED THEIR DUTY TO CORRECT THEMSELVES, OR PROVE THEY COULD GET IT RIGHT TO PREVENT AN INJUNCTION OF*

STAYPUT, NOT ONLY BASED ON FUTILITY. BUT ALSO THE FACT THAT, THE STAY PUT PROVISION STANDS ON ITS OWN MERIT AND DOES NOT REQUIRE EXHAUSTION OF ADMINISTRATIVE REMEDIES. EVENTHOUGH MY MOTHER EXHAUSTED THEM WITH THE STATE ED AGENCY COMPLAINT, SO SHE COULD PROPERLY EXHAUST THEM IN DUE PROCESS WITHOUT FUTILITY. THE STATE EDUCATIONAL AGENCY, DID NOT CORRECT NONE OF ITS ERRORS OR THE ANCHORAGE SCHOOL DISTRICT. THEREFORE FUTILITY WAS SUBSTANTIATED, BY EXHAUSTION OF AN ADMINISTRATIVE COMPLAINT. EXHIBIT X

ALSO SEE EXHIBITS FROM SYLVAN LEARNING CENTER, EXHIBIT Z1, Z2,Z3

THE DUE PROCESS FILED OCT 4, 2005 REGARDING FREE AND APPROPRIATE EDUCATION FOR ME LEWIS DEANS WAS ABORTED BECAUSE OF THE FAILURE OF PARTIES INCLUDING THE DUE PROCESS HEARING OFFICER TO ISSUE 1415 (e) WHICH IS A SIGNIFICANT PROCEDURAL BREACH IN WHICH ALL ADMINISTRATIVE PROCEDURES FOLLOWING THIS PROCEDURAL BREACH WOULD HAVE BEEN IN FUTILITY. THIS PROCEDURE ACCORDING TO IDEA 1400 IS TO TAKE PLACE BEFORE ANY AND ALL EXHAUSTION OF ADMINISTRATIVE PROCEDURES. I AM NOW APPEALLING TO CIVIL COURT IN A CIVIL SUIT UNDER CIVIL PROCEDURES RULE . THIS IS A SEQUENTIAL FILING TO THE PRELIMINARY INJUNCTION THAT WAS ORIGINALLY FILED DEC 2, 2005 IN WHICH RELIEF WAS SOUGHT FOR THE STAY PUT PROVISION THAT LOCAL AND STATE SCHOOL OFFICIALS FAILED TO IMPLEMENT. WITHIN A LEGAL TIMELY FRAMEWORK, TO PREVENT DEPRIVATION OF RIGHTS TO FREE AND APPROPRIATE EDUCATION AND DEPRIVATION OF IDEA ELIGIBILITY RIGHTS AND IMPLEMENTATION THEREOF. WHILE ADMINISTRATIVE REMEDIES EXHAUSTION WAS IN PROCESS FOR LEWIS DEANS. THE LEA AND SEA FAILED PROCEDURES TO ESTABLISH IDEA INELIGIBILITY FOR LEWIS DEANS BY PROPOSING A CHANGE BEFORE INTERIM IEP AND EVALUATION OR A SIGNED WRITTEN LEGAL AGREEMENT CONTRARY TO ELIGIBILITY WAS SUBSTANTIATED. THEREFORE ELIGIBILITY STAYED PUT AS WE DISAGREED WITH ANY PROPOSAL TO CHANGE STATUS AND DEPRIVE LEWIS OF FAPE BASED ON IDEA ELIGIBILITY. AND ALTHOUGH THEY FAILED TO PROVE INELIGIBILITY, THEY DID NOT PROVIDE ANY SERVICES.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE OF MY RIGHT LEWIS DEANS RIGHTS TO FREE AND APPROPRIATE EDUCATION, WHICH IS NOW BEING DENIED.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT LEWIS I DEANS IS PAYING OUT OF MY POCKET TO RECEIVE SOME EDUCATIONAL SERVICES FROM SYLVAN LEARNING CENTER

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT I LEWIS DEANS NEED TO COMPLETE HIGH SCHOOL WITH LEGITIMATE GRADES BASED ON ALASKA STANDARDS AND CONTENT AND IN ACCORDANCE WITH MY IDEA ELIGIBILITY, AND I AM NOW REQUESTING THE SYLVAN LEARNING CENTER PROVIDE ME WITH LEGITIMATE HIGH SCHOOL CREDITS. NOT JUST BASED JUST ON RECEIVING THEM IN THE PAST AS A CONTIUUM OF SERVICES.

THE SIGNIFICANT BASIS FOR THIS REQUEST IS THAT THOSE NAMED IN THE PRELIMINARY INJUNCTION SHOWED A COMPLETE INDIFFERENCE AND DISREGARD FOR MY HEALTH AND EDUCATIONAL ISSUES AND NEEDS. AND NOT ONLY WERE THEY GIVEN A SIGNIFICANT TIME TO APPROPRIATE FREE AND APPROPRIATE EDUCATIONAL SERVICES, THEY WERE ALSO PROMPTED A TO FOLLOW THE LAW BY CERTIFIED RETURNED RECEIPT LETTERS. LETTERS WHICH I ASKED THEM TO PROVIDE ME LEWIS WHAT I AM ENTITLED TO BASED ON FEDERAL LAW OF IDEA ELIGIBILITY. THEY WERE ASKED NOT TO WASTE MONIES IN COURT, MAKING THIS MORE COMPLICATED THEN IT ACTUALLY WAS. SINCE I HAD A COPY OF AN IEP, I HAD A LAST LEGAL AGREEMENT, I

HAD PAPERS PROVING I WAS UNDER STAY PUT, I HAD TWO UPDATED EVALUATIONS CITING SPECIALLY DESIGNED INSTRUCTION, I HAD NO CRIMINAL RECORDS OR MANIFESTATION DETERMINATION. IT WAS ALSO DISCLOSED TO THEM THAT THE EXPIRED 504 THEY WERE UNILATTERALLY DISPLACING ME UNDER, WAS THE SUBJECT OF A LAWSUIT IN THE FEDERAL COURT IN VERMONT ALL OF THIS WAS DISCLOSED, ALL OF THIS WAS DOCUMENTED, ALL OF THIS WAS SUBMITTED. STILL THE LEA AND SEA AND THE PARTIES NAMED IN THE INJUNCTION WANTED TO COOERCE, AND DEPRIVE ME, LEWIS OF MY OBVIOUS AND CRYSTAL CLEAR ENTITLED RIGHTS TO AN INTERIM IEP UNTIL A FULLY UPDATED ONE WAS DEVELOPED. THEY WANTED ME TO RISK MY HEALTH, THROW AWAY MY IDEA ENTITLEMENTS AND IGNORE THAT I WAS ELIGIBLE IN ORDER TO BE MARGINALIZED AND ALLOWED TO COME INTO THE BUILDING OF THEIR DIMOND HIGH SCHOOL. THEY INSISTED ON THIS NARROW FRAME WORK OF ILLEGALITIES UP TO TRYING TO PUSH, AND HAVING THE OPPOSING LAWYER HARRASS ME IN MY HOME, TRYING TO EXPIDITE AN ILLEGAL PRE-HEARING AND HEARING, WITH ME NOT BEING ALLOWED TO LOOK FOR AND RETAIN PROPER COUNSEL.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT THE REHABILITATION ACT OF 1973 ENTITLED 504 WHICH IS A NON-DISCRIMINATORY STATUE, WAS IN FACT USED TO DISCRIMINATE AND DEPRIVE MYSELF LEWIS DEANS OF IDEA ELIGIBILITY RIGHTS. WHICH THE DIMOND HIGH SCHOOL AND ANCHORAGE SCHOOL DISTRICT USED AN EXPIRED 504 AS A PROMPT TO ILLEGAL PRACTICES OF REMOVING THE PARENT AND CHILD FROM EDUCATIONAL ENTITLEMENTS AND CHOICE OF AGREEMENT OR DISAGREEMENT. TO DEPRIVE RIGHTS OF EDUCATIONAL PARTICIPATION. AND THEY ARE HOLDING ME IN A FALSE IMPRISONMENT, BECAUSE I CAN NOT GET SERVICES, FROM VOCATIONAL REHAB, OR ANY OTHER AGENCY, THEY ARE STAGNATING ME, BECAUSE THEY ARE HOARDING THE FEDERAL IDEA FUNDS AND NOT PROVIDING ME WITH SERVICES. AND OTHER AGENCIES JUST REFER ME BACK TO THEM, BECAUSE THEY ARE RECEIVING THE FUNDING. AND BY FEDERAL REGUALATIONS OTHER AGENCIES ARE NOT ALLOWED TO REPEAT SERVICES, THE SEA, AND LEA ARE RECEIVING FUNDING TO PROVIDE.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT A VERIFIED MOTION OF SUMMARY JUDGEMENT WAS SUBMITTED TO ALASKA DISTRICT COURT ALONG WITH OTHER EVIDENCE THAT COULD VERIFY AND SUPPORT PLAINTIFF CLAIMS.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT I LEWIS DEANS EXPECT MY CONSTITUTIONAL RIGHTS TO BE UPHELD OVER ANY AND ALL STATE RIGHTS, AND I AM GIVEN THE RIGHTS ENTILED TO PRO SE' LITIGANTS WHILE MOTIONING FOR COUNSEL.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT I LEWIS REQUEST FOR LEGAL COUNSEL IS AN ATTEMPT TO OVERCOME TECHNICALITIES THAT MAY PREVENT OR PROHIBIT EXECUTING CLAIMS AND ALSO TO ASSIST IN ANY COURT ROOM PROCEDURES.

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT LEWIS DEANS HAVE FULL PARTICIPATION IN ANY DECISIONS MADE BY APPOINTED COUNSEL. AND THAT REQUESTS OF ASSISTANCE BASED ON TECHNICAL PROCEDURES DOES NOT DISCOUNT ANY OTHER DOCUMENTS SUBMITTED OR THAT WILL BE SUBMITTED IN THE DEFENSE OF ME, LEWIS DEANS EDUCATIONAL RIGHTS. AND ASSISTANCE REQUESTED IS NOT BASED ON PLAINTIFF INABILITY TO INTERPRET, ARGUE, OR DEFEND IN WRITING LEGAL RIGHTS. BUT IS PREDICATED ON ALASKA CIVIL PROCEDURES, AND TECHNICAL AND COURT ROOM PRACTICES, IN WHICH EACH STATE HAVE SOME LEVEL OF DIFFERENCES AND THE FACT THAT I AM NOT A LAWYER, AND NEED HELP WITH SELF-REPRESENTATION.

CAUSE

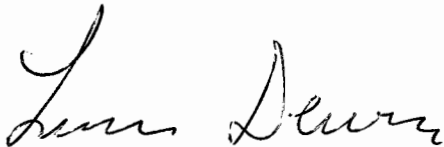
MY LAWSUIT IS EDUCATIONAL MALPRACTICE, DISCRIMINATION, BREACH OF CONTRACT ADA, SECTION 2, 1973 REHABILITATION ACT, IDEA VIOLATIONS, NO CHILD LEFT, BEHIND, FEOG, IDEIA, HCA. DEPRIVATION OF EDUCATIONAL ENTITLEMENTS, EMOTIONAL DURESS, DEPRIVATION OF EQUAL OPPORTUNITY TO EDUCATION. ,CIVIL RIGHTS, DEPRIVATION OF DUE PROCESS, EDUCATIONAL REIMBURSEMENT, TRANSITION AND SUPPORT THROUGH COLLEGE. AND COMPENSORY EDUCATIONAL SERVICES.

DAMAGES

THE MAXIMUM AMOUNT OF MONETARY DAMAGES GIVEN IN DISCRIMINATION OF THE DISABLED, AND VIOLATIONS UNDER THE 1973 REHABILITATION ACT. ALONG WITH IDEA. AND ADA SECTION 2 HANDICAPPED EDUCATIONAL ACT. AND 14TH AMENDMENT

I AM REQUESTING A TRIAL BY A JURY OF 12, AS FULL LEGAL REDRESS, AND ASK THAT THEY ARE PROVIDED AT THE PUBLIC EXPENSE, SINCE I AM INDIGENT AND THIS IS A BASIC CIVIL RIGHT TO EDUCATION. AND THAT ME AND MY ATTORNEY ARE ALLOWED TO INTERVIEW ALL JURERS

I MOTION THE COURT TO TAKE JUDICIAL NOTICE THAT ANY JUDGE PRESIDING OVER THESE PROCEDURES THAT MAY HAVE A CONFLICT BASED ON PERSONAL AFFILIATIONS, PERSONAL PREJUDICES BASED ON CLASS OR RACE, OR ANY RELATIVES WORKING FOR THE LOCAL SCHOOL DISTRICT OR HIGH SCHOOL OR STATE EDUCATIONAL AGENCY, RECUSE HIMSELF RESPECTFULLY, AND ALLOW FEDERAL AND CONSTITUTIONAL LAW BE THE LEADING FACTOR IN THE DETERMINATION OF FEDERAL AND CONSITUTIONAL LAW AND MANDATES. AND IDEA 1400 ENFORCEMENT, AND RIGHTS TO INJUNCTION ON THE STAY PUT PROVISION OF 1415 (e). ALL THE PROPER PAPERS WILL BE FILED

A handwritten signature in black ink, appearing to read "L. L. L. L." or similar, written in a cursive style.